

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER COMPANY)
d/b/a AMERICAN ELECTRIC POWER FOR)
APPROVAL, TO THE EXTENT NECESSARY,) Case No. 2002-00475
TO TRANSFER FUNCTIONAL CONTROL OF)
TRANSMISSION FACILITIES LOCATED IN)
KENTUCKY TO PJM INTERCONNECTION, L.L.C.)
PURSUANT TO KRS 278.218)

**PETITION TO INTERVENE OF
PJM INTERCONNECTION, L.L.C.**

Pursuant to KRS 228.310 and 807 KAR 5:001 Section 3(8), PJM Interconnection, L.L.C. (hereinafter "PJM") requests that it be granted full intervenor status in the above-captioned Application and states in support thereof as follows:

1. The Petitioner, PJM, has its offices located at 955 Jefferson Avenue, Valley Forge Corporate Center, Norristown, Pennsylvania 19403-2497. The Petitioner's attorney for the purpose of receiving service of all documents in this proceeding is Brent L. Caldwell, Esq., McBrayer, McGinnis, Leslie & Kirkland, PLLC, 201 East Main Street, Suite 1000, Lexington, Kentucky 40507.

2. PJM is the Independent System Operator since 1998 for all or part of the state of New Jersey, Delaware, Maryland, Pennsylvania, Virginia, and the District of Columbia.¹ PJM has also received provisional FERC approval as a Regional Transmission Organization.² PJM has received FERC approval for the expansion of PJM to include PJM West through several orders in 2001 and 2002.³

¹ *Pennsylvania-New Jersey-Maryland Interconnection*, 81 FERC ¶ 61,257 (1997).

² *PJM Interconnection, L.L.C.*, 81 FERC ¶ 61,257 (1997).

³ *PJM Interconnection, L.L.C.*, 96 FERC ¶ 61,061 (2001); *See Alliance Cos.*, 100 FERC ¶ 61,137 (2002).

3. PJM's primary responsibilities are to ensure the safe and reliable operation of the transmission system and to facilitate the reliable supply of energy from generating resources to wholesale customers in the PJM region. Pursuant to Section 7.7(i) of the PJM Operating Agreement, PJM is obligated to ensure the safe and reliable operation of the transmission grid and to create and operate a robust, competitive, and non-discriminatory electric power market.

4. PJM has an interest in this Application that is not adequately represented by other parties to this proceeding. American Electric Power's (hereinafter "AEP") application was filed to allow it to transfer functional control of its transmission facilities to PJM.

5. Through its participation in this proceeding, PJM seeks to provide testimony to the Kentucky Public Service Commission and brief issues on the benefits that the Commonwealth of Kentucky will have as a result of AEP joining PJM. After reviewing the prefiled direct testimony in the above-captioned docket, PJM may identify additional issues it wishes to pursue before the Kentucky Public Service Commission.

6. PJM states that its participation in this case will assist the Commission in reaching its decision and would not unduly interrupt the proceedings.

WHEREFORE, PJM respectfully requests the Commission to grant its Petition to Intervene and to allow it to participate with full intervenor status in this proceeding.

Dated this 20th day of February, 2002.

Respectfully submitted,

MCBRAYER, MCGINNIS, LESLIE
& KIRKLAND, PLLC
201 E. Main Street, Suite 1000
Lexington, KY 40507
(859) 231-8780



BRENT L. CALDWELL
ATTORNEY FOR PETITIONER,
PJM INTERCONNECTION, LLC

CERTIFICATE OF SERVICE

It is hereby certified that an original and ten (10) copies of the Petition to Intervene on behalf of PJM Interconnection, L.L.C., in the aforementioned case were hand-delivered upon the following:

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

and that one (1) copy of the Petition was served via U.S. mail, postage pre-paid, upon the following:

Michael L. Kurtz, Esq.
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Richard G. Raff
Public Service Commission of Kentucky
211 Sower Boulevard
Frankfort, KY 40601

this 20th day of February, 2003.


BRENT L. CALDWELL

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